

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

UNITED STATES OF AMERICA)	CASE NO. 1:10-CR-387-04
)	
Plaintiff,)	JUDGE SARA LIOI
)	
-vs-)	
)	
)	
JERRY SKUHROVEC)	DEFENDANT JERRY SKUHROVEC'S
)	MOTION TO TRAVEL
Defendant.)	

Defendant Jerry J. Skuhrovec now requests permission to travel outside of the jurisdiction of the Northern District of Ohio in January or February, 2017¹. Defendant wishes to travel from his home in Independence, Ohio to Cancun, Mexico for vacation. As the court is aware, the conditions of Mr. Skuhrovec's probation limit travel to within the Northern District of Ohio unless granted specific permission from the court or probation officer. (The probation officer has no objection to this request, but directed that Mr. Skuhrovec obtain the court's permission for travel out of the country.)

Mr. Skuhrovec has lived in the Cleveland area nearly his entire life. He owns a home in Independence, where he has lived for many years.

Mr. Skuhrovec was not charged with a violent crime, drug trafficking or a weapons-related offense. He has been now been on probation for over four years. During all of that time, he has been compliant with all terms of probation. This includes providing detailed monthly financial reports relating to his business and income properties. He has been in good

¹Mr. Skuhrovec does not know the specific travel and accommodation dates that will be available. He did not want to book the travel without court approval.

communication with his probation officer, and has always obtained advance permission to travel outside of the Northern District of Ohio on the few occasions he has taken such trips. During those occasions, he has never absconded or taken any other action that would indicate a flight risk.

Mr. Skuhrovec is now 69 years old. He has lost his parents and a brother in the time he has been on probation. His health is fairly stable at the moment, and he would like to take advantage of it while he still can.

For the foregoing reasons, Mr. Skuhrovec requests permission to travel to Cancun, Mexico in January or February, 2017

Respectfully submitted,

/s/Michael P. Maloney

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CERTIFICATE OF SERVICE

A copy of the foregoing was served this 28th day of September, 2016, upon the U.S. Attorney by way of the court's electronic filing system.

/s/Michael P. Maloney

Michael P. Maloney